

May 16, 2016

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Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Application of South Carolina Telecommunications Group Holdings,
LLC d/b/a Spirit Communications to Amend Certificate of Public
Convenience and Necessity to Provide Facilities-Based and Resold
Local Exchange Telecommunications Services, and for Flexible
Regulation of Its Local Exchange Services
Docket No. 2016-180-C

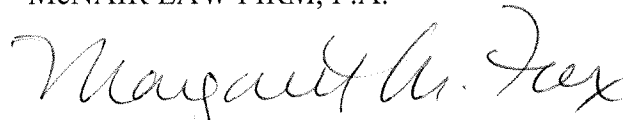
Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition (the "Coalition"), a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service all parties of record will receive a copy of this Petition to Intervene via the U. S. Postal Service.

Thank you for your assistance.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

Enclosure

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BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2016-180-C

Re: Application of South Carolina)	
Telecommunications Group Holdings,)	
LLC d/b/a Spirit Communications to)	PETITION TO INTERVENE
Amend its Certificate of Public)	
Convenience and Necessity to Provide)	
Facilities-Based and Resold Local)	
Exchange Telecommunications Services,)	
and for Flexible Regulation of Its Local)	
Exchange Services)	

In response to the Commission's Notice of Filing of the Application of South Carolina Telecommunications Group Holdings, LLC d/b/a Spirit Communications to Amend its Certificate of Public Convenience and Necessity to Provide Facilities-Based and Resold Local Exchange Telecommunications Services, and for Flexible Regulation of Its Local Exchange Services, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would


potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
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By: 

Attorneys for Intervenor South Carolina
Telephone Coalition

May 16, 2016

Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2016-180-C

Re: Application of South Carolina)
Telecommunications Group Holdings,)
LLC d/b/a Spirit Communications to)
Amend its Certificate of Public)
Convenience and Necessity to Provide)
Facilities-Based and Resold Local)
Exchange Telecommunications Services,)
and for Flexible Regulation of Its Local)
Exchange Services)

CERTIFICATE OF SERVICE

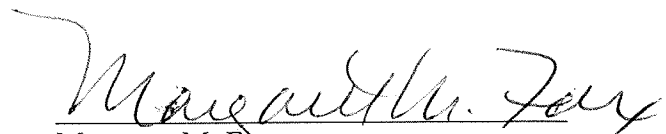
I, Margaret M. Fox, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited in the United States Mail, First Class, postage prepaid to:

Carrie L. DeVier, Esquire
Herman & Whiteaker, LLC
2732 Wheat Street
Columbia, SC 29205

Shannon Bowyer Hudson, Esquire
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Columbia, South Carolina 29201

Donald L. Herman, Jr., Esquire
Robin E. Tuttle, Esquire
Herman & Whiteaker, LLC
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Bethesda, MD 20817

For Applicant South Carolina
Telecommunications Group
Holdings, LLC d/b/a Spirit
Communications



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